

AARON D. FORD  
 Attorney General  
 PETER E. DUNKLEY, Bar No. 11110  
 Deputy Attorney General  
 State of Nevada  
 Public Safety Division  
 100 N. Carson Street  
 Carson City, NV 89701-4717  
 Tel: (775) 684-1259  
 E-mail: pdunkley@ag.nv.gov

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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

*Attorneys for Defendants*  
 Sonya Carrillo, Frank Dreesen, Philip Gang,  
 William Gittere, Steve Green, Judith Hebert, Jerry Howell,  
 Michael Minev, Ronald Oliver, William Reubart,  
 Bonnie Swadling, Devlin Thompson,  
 Harold Wickham and Brian Williams

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

*ORDER*

NATHANIEL WILLIAMS,  
 Plaintiff,

v.

WILLIAM GITTERE, et al.,  
 Defendants.

Case No. 3:18-cv-00282-MMD-CBC

**MOTION FOR EXTENSION OF TIME TO  
 ANSWER THIRD-AMENDED COMPLAINT**

Defendants, Sonya Carrillo, Frank Dreesen, Philip Gang, William Gittere, Steve Green, Judith Hebert, Jerry Howell, Michael Minev, Ronald Oliver, William Reubart, Bonnie Swadling, Devlin Thompson, Harold Wickham and Brian Williams, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada and Peter E. Dunkley, Deputy Attorney General, hereby submit this Motion for Extension of Time to Respond to Plaintiff's Third Amended Complaint (ECF No. 17). This Motion is based on Federal Rule of Civil Procedure 6(b)(1)(A), the following Memorandum of Points and Authorities, and all papers and pleadings on file in this action.

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. ARGUMENT**

Defendants respectfully requests a twenty eight (28) day extension of time out from the current deadline of December 23, 2019, to respond to Answer the Third Amended Complaint (TAC) (ECF No. 17).

1 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:

2 When an act may or must be done within a specified time, the court may, for  
3 good cause, extend the time: (A) with or without motion or notice if the court  
4 acts, or if a request is made, before the original time or its extension expires; or  
5 (B) on motion made after the time has expired if the party failed to act because of  
6 excusable neglect.

7 Defendants' request is timely and its nature will not hinder or prejudice Plaintiff's case, but will  
8 allow for accurate responses to Plaintiff's voluminous TAC, weighing in at 44 pages, containing nine  
9 counts alleged against 33 separate defendants.

10 In this case, there is good cause for the extension due to current staffing levels at the Office of  
11 the Attorney General. Recently, several deputies attorney general have left the office resulting in  
12 reassignment of their respective case loads and the cases' respective deadlines. Counsel for Defendants  
13 respectfully requests 28 days to answer the TAC. The new deadline would be January 20, 2020.

14 Defendants' request is timely and, if granted, will not hinder or prejudice Plaintiff's case, but  
15 will allow for better response to Plaintiff's TAC. Additionally, some defendants last known addresses  
16 have been filed under seal (ECF No. 73) on whom Plaintiff will presumably attempt service, which if  
17 properly effected, will require that newly served defendants answer the TAC. Additionally, there is  
18 currently a status conference set for January 21, 2020, regarding the status of Plaintiff's medical  
19 condition and the appointment of Pro Bono counsel for possible injunctive relief.


20 For these reasons, Defendants respectfully request a twenty eight (28) day extension of time  
21 from the current deadline to respond to Plaintiff's TAC, with the new deadline of January 20, 2020.

22 DATED this 23rd day of December, 2019.

23 AARON D. FORD  
24 Attorney General

25 By: /s/ Peter E. Dunkley  
26 PETER E. DUNKLEY, Bar No. 11110  
27 Deputy Attorney General

28 *Attorneys for Defendants*

**IT IS SO ORDERED**  
  
**U.S. MAGISTRATE JUDGE**

DATED: 1/9/2020